

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:13-CR- 00063-KI

v.

INDICTMENT

SHAUN SNAPP,

31 U.S.C. §§ 5316, 5332(a) & (b); 31 U.S.C.
§§ 5317(c), 5324(c)(1) & (d); 21 U.S.C. §
853(p)

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

BULK CASH SMUGGLING

On or about December 30, 2011, in the District of Oregon, defendant **SHAUN SNAPP**, with the intent to evade the currency reporting requirements under Title 31, United States Code, Section 5316, knowingly concealed more than \$10,000 in currency on his person and in his luggage and other container, and transported, transferred and attempted to transport and transfer such currency from a place outside of the United States to a place within the United States, in violation of Title 31, United States Code, Sections 5332(a) & (b).

COUNT 2

**FAILURE TO FILE INTERNATIONAL
MONETARY INSTRUMENT TRANSACTIONS**

On or about December 30, 2011, in the District of Oregon, defendant **SHAUN SNAPP** did knowingly and for the purpose of evading the reporting requirements of Title 31, United

States Code, Section 5316 and regulations promulgated thereunder, fail to file a report required under Title 31, United States Code, Section 5316 and regulations prescribed thereunder, in violation of Title 31, United States Code, Sections 5316(a)(1)(B), and 5324(c) & (d).

FORFEITURE ALLEGATION AS TO COUNT 1

Upon conviction for the offense alleged in Count 1 of this Indictment, defendant **SHAUN SNAPP** shall forfeit to the United States all property, real and personal, involved in the offense, and any property traceable to such property, pursuant to Title 31, United States Code, Sections 5332(b)(2) including, but not limited to, \$303,13.00 in U.S. currency and the equivalent of \$1,091.89 in foreign currency.

If any of the above-described property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficult, it

is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

FORFEITURE ALLEGATION AS TO COUNT 2

Upon conviction for the offense alleged in Count 2 of this Indictment, defendant **SHAUN SNAPP** shall forfeit to the United States all property, real and personal, involved in the offense, and any property traceable to such property, pursuant to Title 31, United States Code, Section

5317(c)(1), including, but not limited to \$303,13.00 in U.S. currency and the equivalent of \$1,091.89 in foreign currency.

If any of the above-described property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficult, it

is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

Dated this 12 day of February 2013.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL, OSB #953473
United States Attorney
District of Oregon


ANNEMARIE SGARLATA, OSB #065061
Assistant United States Attorney